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*Attorneys for Defendants Gammon Gold Inc.,
Fred George, Bradley Langille,
Russell Barwick, and Colin Sutherland
(collectively, the “Gammon Defendants”)*

UNITED STATE DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MIDAS FUND, INC.,

Plaintiff,

VS.

GAMMON GOLD INC., FRED
GEORGE, BRADLEY LANGILLE,
RUSSELL BARWICK, COLIN
SUTHERLAND, BMO NESBITT
BURNS INC., SCOTIA CAPITAL INC.,
and TD SECURITIES INC.,

Defendants.

Index No. 07 CV 6707 (NRB)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying (i) Memorandum of Law in Support of Gammon Gold Inc.'s and the Individual Defendants' Motion to Dismiss the Second Amended Complaint; (ii) the Disclosure Statement Pursuant to Local Civil Rule 7.1; and (iii) the Declaration of John Rock, sworn to on December 21, 2007, and the exhibits thereto, defendants Gammon Gold Inc., Fred George, Bradley Langille, Russell Barwick and Colin Sutherland

(collectively “Gammon Gold Defendants”), by their attorneys Dorsey & Whitney LLP, shall move this Court for an Order (i) dismissing all of the claims asserted by plaintiff Midas, Inc. (“Midas”) against the Gammon Gold Defendants, with prejudice; (ii) awarding the Gammon Gold Defendants costs and disbursements; and (iii) awarding the Gammon Gold Defendants any other relief that the Court deems appropriate.

PLEASE TAKE FURTHER NOTICE that the Court has established the following schedule for the briefing of this motion pursuant to the Stipulation between the parties dated December 3, 2007:

1. Service and filing of moving papers – December 21, 2007;
2. Service and filing of answering papers – January 25, 2008;
3. Service and filing of reply papers – February 15, 2008.

PLEASE TAKE FURTHER NOTICE that the Gammon Gold Defendants request oral argument on this motion.

DATED: New York, New York
December 21, 2007

DORSEY & WHITNEY LLP

/s/Brooke E. Pietrzak

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